

DEPT. OF TRANSPORTATION
DOCKETS

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January 9, 2008

Nicole R. Nason, Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Ref: PETITION FOR RECONSIDERATION
DOT Docket No. NHTSA-2007-0040
Federal Motor Vehicle Safety Standards; Cargo Carrying Capacity

Ms. Nason:

Upon reviewing the NHTSA final ruling relating to Load Carrying Capacity in recreational vehicles, I respectfully submit the following three (3) petitions. In addition to being an RV consumer advocate for several years, I am an RV consumer, having owned several motorhomes. I applaud the NHTSA for recognizing the need for this ruling.

Petition #1:

Virtually all owners fill their fresh water tanks to capacity before leaving home or a campground. We do not think about weight.... We are thinking about taking a shower or flushing the toilet before we return home or find the next campground. Also, having a full water tank reduces the amount of "load shift" when traveling. Partially filling the fresh water tank can have negative effects on the ABS braking system and steering control, and encouraging the consumer to "drain" the fresh tank to compensate for carrying capacity is unrealistic and wasteful of our precious natural resources. Finally, when we add occupants, we generally need more water, not less.

You acknowledge in your brief that "water weight can be a significant part of total cargo capacity." This statement is true, and if left defined under the Occupant & Cargo Carrying Capacity, most recreational vehicles will continue to be operated in an overloaded state.

For several years, the RV consumer has been indoctrinated that fresh water is *not* part of the CCC of their recreational vehicle. By including "water weight" in the Occupant & Cargo Carrying Capacity, the RV industry will market the higher cargo carrying capacity of their product to the consumer. Since CCC (Cargo Carrying Capacity) will no longer, by definition, be a legal term used by the RVIA, the industry will adopt the phrase for marketing purposes, knowing the consumer may not recognize the redefinition of the phrase.

For the reasons stated above, I respectfully petition that the weight of onboard water be incorporated into the vehicle's UVW and NOT be treated as cargo.

Petition #2:

For proper braking and steering control of any vehicle, the weight distribution of that vehicle is required to meet a certain criteria. Recreational vehicles are noted for their poor weight distribution by design. When Incomplete Vehicle Upfitters sell to the Special Vehicle Manufacturers, a technical bulletin or Body manual is published to define standards to be followed by the SVM. Often, these standards are breached by the SVM as they attempt to "market engineer" their product.

In a typical motorhome, the generator, coach batteries, fresh water, gray water, black water, and at least 1 slide-out are located on the driver's side of the vehicle. Frequently, frame rails are extended to accommodate more features. I own a 2007 Four Winds Dutchmen, manufactured by Thor Industries, the world's largest RV manufacturer. A recent scale reading by the Missouri Highway Patrol disclosed the driver's side of my vehicle is 1800 lbs. heavier than the passenger side. My Class C motorhome was devoid of all personal cargo except for a spare tire, fresh water and fuel. The driver's side rear axle weighed 6700 lb, while the maximum carrying capacity is 6750 lb. Although the stated CCC of my motorhome is 1364 lbs, any cargo, passengers, or tongue weight placed in/on my recreational vehicle will render it overloaded by definition.

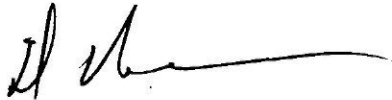
I petition that the RV industry be required to rate the Occupant & Cargo Carrying Capacity by a 4- corner scale reading, rather than by the GVWR, to better inform the consumer as to how to distribute the load in the vehicle. The consumer cannot properly load the vehicle if he doesn't know where the vehicle is over/under loaded. In many cases, the excess cargo carrying capacity is over the front axle, which is virtually impossible to load. This action would also force the RV industry to build the recreational vehicle with more weight/balance safety guidelines in place.

The consumer must be responsible for "load distribution," but the RV industry must be made accountable to guide the consumer in the "weight distribution" of their product.

Petition #3:

Finally, I urge the NHTSA to require the RV industry to incorporate their final ruling information not only in their products, but also in sales literature and websites, to better inform the RV Consumer.

Respectfully Submitted,



Dennis R. Myhre, AIC
113 Sherwood Drive
Branson, MO 65616

417-593-9177

Dmyhre943@aol.com